

3. A true and correct copy of Southwest's Policy Concerning Harassment, Sexual Harassment, Discrimination & Retaliation, last revised on January 1, 2023, is attached as **Exhibit B.**

4. A true and correct copy of the Southwest Airlines Policy Concerning Harassment, Sexual Harassment, Discrimination & Retaliation Acknowledgement, last revised in June 2015, is attached as **Exhibit C.**

5. A true and correct copy of Section 19.2 of Southwest's Guidelines for Employees: A Policy and Procedure Handbook, last revised on January 19, 2023, is attached as **Exhibit D.**

6. A true and correct copy of Southwest's Disability Discrimination and Workplace/Religious Accommodation Policy, last revised on January 1, 2023, is attached as **Exhibit E.**

7. After the Court's judgment, Southwest added a discussion of religious accommodation to its anti-discrimination training for all leaders in the company. This training reminds Southwest's leaders that employees' religious beliefs should be accommodated in the same manner as disabilities.

Executed on May 19, 2023.

/s/ Christopher Maberry
Christopher Maberry

App. 002

Exhibit A

App. 003

Southwest Airlines[®] Human Rights Policy Statement



App. 004

Southwest Airlines’ Human Rights Policy Statement

Southwest has a more than 50-year history of **proudly putting People first**—which extends to our Employees, Customers, business partners, and the People in the Communities we serve. Our support of human rights transpires in a variety of ways, including our recruitment efforts, how we train, treat, and equip our Employees, our commitment to hospitality and civility (both internally and externally), our dedication to an ethical supply chain, and the support we provide to a variety of organizations in service to our communities.

While it is the duty of the government to protect human rights, Southwest is committed to doing the right thing to protect and promote human rights in all areas of our business and will remain steadfast in guarding against human rights abuses by complying with applicable laws and establishing and upholding appropriate policies. Our approach to human rights is consistent with international standards and we support and align with [U.N. Guiding Principles for Business and Human Rights](#), the [International Bill of Human Rights](#) (Universal Declaration of Human Rights and the International Covenants on Economic, Social and Cultural Rights and International Covenants on Civil & Political Rights.); and the International Labor Organization (ILO) [Declaration on Fundamental Principles and Rights at Work](#).

Additionally, in support of the rights of women and children and in an effort to eliminate racial discrimination, we also expressly will not tolerate discrimination, trafficking, and/or exploitation of women, children, and peoples of all races, national origins, and color.

At Southwest, we are strong supporters of protecting each individual's basic human and civil rights and are guided by fundamental principles to not only comply with the law at all times but also to avoid the appearance of impropriety in the actions of our Employees and our business partners.

We are committed to maintaining the highest standards of ethical business practices and legal and regulatory compliance as stated in our [Code of Ethics](#). We regularly evaluate our approach to human rights and assess our impact in all aspects of our business.

Our Purpose and Values

Our commitment to human rights principles is evident in the way we carry out our Purpose, our Vision, and our Values.

- **Our Purpose:** Connect People to what’s important in their lives through friendly, reliable, and low-cost air travel.
- **Our Vision:** To be the world’s most loved, most efficient, and most profitable airline.
- **Our Values:**

Me How I Show Up	We How We Treat Each Other	Southwest How Southwest Succeeds
Pride	Teamwork	Efficiency
Integrity	Honesty	Discipline
Humility	Service with LUV App. 005	Excellence

Our Employees

Our Promise to Employees states that: *Southwest will provide a stable work environment with equal opportunity for learning and personal growth. Employees will be provided with the same concern, respect, and caring attitude within our organization that they are expected to share externally with every Southwest Customer.*

We implement Company policies and procedures that support and respect the protection of human rights within our sphere of influence. These policies include our commitment to:

- Prohibit any form of harassment, discrimination, or retaliation based on race, color, ancestry, religion, age, sex, sexual orientation, gender, gender expression, gender identity, pregnancy, marital status, national origin, physical or mental disability, military or veteran status, genetic information, medical condition, or any other legally protected status.
- Prevent Human Trafficking
- Provide equal employment opportunities for persons with disabilities and covered veterans
- Affirmative action for women and minorities
- Prohibit disability discrimination and provide reasonable workplace accommodations
- Establish guidelines to assist Transgender Employee
- Respect the right of Employees to associate freely and choose or not choose collective bargaining representation

At Southwest, we are committed to training and educating our Employees on various human rights issues and important topics. All People policies including Southwest's anti-harassment policy, equal employment opportunity policies, accommodations policies, and human trafficking policy are available and easily accessible to all Employees. Through our Most Compliant Leader training, Leaders are trained biannually on a variety of policies, including those related to human rights matters. We also deliver disability awareness training that provides an overview on how to best demonstrate Hospitality to our Customers with disabilities. In addition, our Customer-facing Operational Employees receive annual training on our responsibilities as an airline.

Our strategy for employment and labor practices is guided by our Executive Vice President People and Communication, our People (HR) Department, our department of Diversity, Equity, and Inclusion, our Labor Relations Department, and our Legal Department, which includes divisions devoted solely to Labor Administration and Employee Relations.

Our Customers

We take great pride in extending our Southwest Hospitality to [all of our Customers](#), which includes living by the Golden Rule and treating every individual with respect. We strive to create a warm and welcoming onboard experience that enables a safe travel environment for all Customers.

Our Communities

We uniquely contribute to each community focusing on gaps and opportunities that will help drive economic, social, or environmental benefits. We remain diligent in monitoring emerging societal issues and topics. Our response to these circumstances is based on a number of factors, including the potential impact on our Employees, brand and reputation, business operations, and Customers. We regularly review our annual community contributions and continue to evaluate their effectiveness through impact reports and ongoing touchpoints with key partners and Stakeholders. We regularly solicit reports and metrics from our Partners, and we continue to hone our reporting process to further refine our overall citizenship progress and results.

Diversity, Equity, and Inclusion

Southwest recognizes, respects, and values differences. By fostering a Culture that embraces and utilizes diversity, we promote Teamwork and innovation that contributes to our overall success. Southwest was founded on the principle of putting People first, and we've never wavered from that commitment. We are dedicated to celebrating diversity and fostering an equitable and inclusive environment for all.

At Southwest, we are committed to doing our part to [drive meaningful change](#)—both inside our Company and out. We're committed to being a place where Employees feel welcomed and encouraged to bring their whole authentic selves to work. We're committed to listening to our People—Employees and Customers—and making changes when needed. We're dedicated to the communities we serve and are working alongside our nonprofit partners to champion diversity, equity, and inclusion.

Discrimination, Harassment, and Retaliation

Southwest does not tolerate discrimination, harassment, or retaliation of any kind. We are committed to abiding by all applicable laws and Company policies to create a workplace that is based upon respect and equality.

App. 006

Human Trafficking

Southwest is committed to doing its part to educate its Employees and Customers about human trafficking and takes steps to prevent human trafficking on our aircraft and the airports we serve.

Freedom of Association and Collective Bargaining

Southwest respects an Employee's right to join or not join a labor union or association without fear of reprisal, intimidation or harassment. In accordance with applicable laws, Southwest bargains with its Unions when contracts become amendable. In labor contract negotiations, our philosophy is to reach agreements that are rewarding for Employees, have scheduling flexibility that allow the Company to operate safely and efficiently in a highly competitive marketplace, and provide long-term job security. Southwest is committed to jointly work with its Unions for the benefit of our Employees through open dialog and partnership.

Safety and Security

Southwest Airlines' Operational Philosophy defines key principles and expectations for Frontline Employees. Most importantly, and without compromise, we put Safety first. Employees follow Company policies and procedures designed to enable operations at an acceptable level of risk for Southwest. Next, and only after operating safely, we balance low cost and Reliability, all delivered with world-class Hospitality.

Southwest's Safety Policy is reflected in our [Safety and Security Commitment](#). The commitment is a pledge by all Southwest Employees and Senior Leadership to the Safety and Security of our Customers and Employees—it establishes clear Employee expectations and associated accountability.

Supply Chain

Our efforts to respect and protect human rights also extends to our supply chain. To support our operation, we purchase goods and services from thousands of sources across multiple continents and countries, but the majority of our supply base and spend is in the U.S. domestic market since our network footprint is primarily as a North American carrier. We maintain relationships directly with various types of suppliers, including service providers, contractors, manufacturers, brokers, and wholesalers.

Southwest is committed to maintaining our low-cost Leadership through effective and efficient procurement practices and spending our capital wisely. All suppliers are treated fairly and impartially during the evaluation and selection process. We use more than one selection process, depending on Company requirements and supply market conditions. Each selection process is focused on finding the best combination of quality, reliability, efficiency, and service for Southwest at the lowest total cost. Internally, our Employees are expected to adhere to a Procurement Policy for Employees and we expect all internal and external participants in the procurement process to observe the highest standards of ethical conduct. We also have a supplier assessment questionnaire as a crucial part of the vetting process and expect suppliers to comply with applicable laws, including those regarding child and/or forced labor.

We partner with our suppliers to have a positive impact with the products and equipment we use in the skies, on the ground, and in our offices. We seek to build sustainable and mutually beneficial relationships with our suppliers to help fulfill our operational needs, stimulate economic growth in the communities we serve, support small and minority-owned businesses, and satisfy the expectations of our Stakeholders. Our [Supplier Diversity Program](#) looks to build sustainable, diverse suppliers.

At Southwest, we understand that our business impacts the markets we serve. We strive to positively affect these communities by way of our outreach and engagement initiatives to build longstanding relationships with our community partners and suppliers.

Conclusion

Southwest supports human rights as an employer, a business partner, and a global citizen. We envision a sustainable future where a balance exists between protecting the world for future generations and serving the interests of our Employees, Customers, Shareholders, and other Stakeholders, serving as good environmental stewards, fostering a creative and innovative workforce, and giving back to the communities we serve.

App. 007

Exhibit B

App. 008

Southwest Airlines Policy Concerning Harassment, Sexual Harassment, Discrimination & Retaliation

Effective: 01/01/2023

Issued by Southwest Airlines January 2023; Effective Until/Unless Reissued

Southwest Airlines prohibits any and all types of harassment, sexual harassment, discrimination, and/or retaliation against Employees by Leaders, fellow Employees, or third parties. Harassment or discrimination based on race, color, ancestry, religion, age, sex, sexual orientation, gender, gender expression, gender identity, pregnancy, marital status, national origin, physical or mental disability, military or veteran status, genetic information, medical condition, or any other legally protected status, negatively affects morale, motivation, and job performance. Such behavior is inappropriate, offensive, and will not be tolerated.

EXAMPLES OF TYPES OF DEROGATORY, SEXUALLY SUGGESTIVE, OFFENSIVE, THREATENING, INTIMIDATING, HOSTILE, OR RETALIATORY CONDUCT THAT ARE PROHIBITED INCLUDE BUT ARE NOT LIMITED TO:

- verbal comments, including voicemail or recorded statements;
- written comments, including email, text messages, or social media online posts;
- unwanted physical behavior including pats, squeezes, deliberate brushing against someone's body, impeding/blocking normal work or movement, or unwanted sexual advances;
- displaying or forwarding messages, photos, graffiti, pictures, cartoons, drawings, social media posts, online comments, symbols, or logos including displaying such content at one's own work area, computer, or mobile device;
- epithets or slurs are always offensive and will not be tolerated for any reason, even if an Employee mistakenly believes such epithets to be a funny part of a joke or prank; and
- basing or threatening to base any employment decision (such as an Employee's performance evaluations, work assignments, or advancement) upon an Employee's submission to harassing behavior.

Reporting & Investigations

Employees, including Leaders, have a duty to promptly and to accurately report any actual, threatened, or perceived incidents of harassment, sexual harassment, discrimination, or retaliation to their Supervisor, Manager, Director, Vice President, or the Employee Relations Team. Leaders who themselves observe or who are made aware of harassment, sexual harassment, discrimination, or retaliation concerns or complaints should immediately contact Employee Relations in the People Department at HDQ.


All complaints should be referred to Employee Relations, the Team designated by Southwest Airlines to conduct, document and track all investigations under this Policy. Employee Relations will investigate all referred complaints promptly, impartially, and discreetly.

- Employees are encouraged to participate in investigations and are expected to refrain from discussing the investigation with other Employees.
- Upon completion of an investigation, the appropriate parties will be notified that the investigation is completed.
- Information obtained by Southwest Airlines through the complaint/investigation process will generally be treated confidentially except for what is required to properly investigate complaints, take appropriate responsive actions, or as otherwise required by law or business necessity.
- Any Employee who has been found to have acted inappropriately against another Employee in violation of this policy will be subject to appropriate corrective action up to and including termination.
- If after investigating a complaint, Southwest Airlines determines that the complaint was not made in good faith or that an Employee has provided false information, appropriate corrective action up to and including termination may be taken.

Retaliation is Prohibited

Retaliation typically involves adverse actions against an individual engaging in protected activity. Protected activity involves an Employee asserting his/her right to be free from employment discrimination and/or harassment. Examples include making a complaint under this policy and/or participating in an investigation under this policy. Negative comments (verbal or written), negative behavior, or adverse employment actions toward someone because he/she has engaged in protected activity is strictly prohibited.

It is expected that Employees of Southwest Airlines will act responsibly to maintain a positive working environment, free of harassment, sexual harassment, discrimination, and retaliation, and free of hostile, threatening, or intimidating behavior, allowing each Employee to perform at his/her maximum potential. Southwest Airlines encourages any Employee to bring any questions regarding harassment, sexual harassment, discrimination, or retaliation to his/her Leaders or to the Employee Relations Team.


Robert E. Jordan
Chief Executive Officer
Elizabeth A. Bryant
Senior Vice President People, Learning, & Development

App. 009

Exhibit C

App. 010

**PPL-017 Policy Concerning Harassment, Sexual Harassment,
Discrimination & Retaliation Acknowledgment**



15-02 06/2015

**Southwest Airlines Policy Concerning Harassment, Sexual Harassment, Discrimination & Retaliation
Acknowledgment**

By signing below, I certify the following:

1. I understand that Southwest Airlines complies with this policy, and I am expected to adhere to this policy.
2. I understand that failure to adhere to this policy may result in disciplinary action, up to and including **termination** of employment.
3. I understand that this policy is updated as needed and can be reviewed at any time for Southwest Airlines Employees via the following path: **SWALife**>Tools>Policies>People Policies>Company Policy Posters>Harassment Policy and **SWALife**>Tools>Policies>People Polices>General Policies>Guidelines for Employees: A Policy and Procedure Handbook (GFE).

Date: _____

Employee Number: _____

Employee Name (printed): _____

Employee Name (signed): _____

App. 011

Exhibit D

App. 012



Guidelines for Employees: A Policy and Procedure Handbook

Revision Number: 23-02

Revision Date: 04/11/2023

☐ Dark Mode 19 Other Guidelines > 19.2 On and Off Duty Conduct

19.2 On and Off Duty Conduct

Revised: 01/19/2023

Southwest Airlines does not want to interfere in the personal affairs of Employees. However, Employees should be mindful that their conduct, even off duty, can affect our Customers' perceptions of Southwest Airlines. As a result, any Employee's on or off duty conduct which reflects adversely on the Company, or which renders the Employee unfit for continued performance of his/her duties, may subject the Employee to disciplinary action, up to and including termination of employment.

This section generally does not apply to conduct supporting or opposing a union, with limited exceptions such as threats of violence, defamatory statements, or conduct that violates a law. An Employee's conduct supporting or opposing a union will in most cases not be the cause of discipline.

Document copies printed or saved from this electronic version are considered uncontrolled.

Exhibit E

App. 014

Disability Discrimination and Workplace/Religious Accommodation Policy

Effective: 01/01/2023

Issued by Southwest Airlines January 2023; Effective Until/Unless Reissued

Disability Discrimination Prohibition

Southwest Airlines prohibits any and all types of discrimination against a qualified applicant or Employee on the basis of: (1) a current disability, (2) record of a prior disability, (3) being perceived or regarded as disabled, or (4) a relationship or association with someone with a disability. A qualified applicant or Employee is an individual who can perform the essential functions of the job in question, either with or without a reasonable accommodation.

Religious Discrimination Prohibition

Southwest Airlines prohibits any and all types of discrimination against an applicant or Employee on the basis of a religious belief or practice. As noted below, Southwest Airlines will make, on request, an accommodation for such religious beliefs or practices when a reasonable accommodation is available that does not create an undue hardship on the Company's business.

Reasonable Accommodation

If Southwest Airlines is notified that a qualified individual with a disability or religious request requires a reasonable accommodation in order to participate in the application process, perform the essential functions of a job, or enjoy equal benefits and privileges of employment, Southwest Airlines will work with that person to find a reasonable accommodation unless to do so would impose an undue hardship on the operation of Southwest Airlines' business. Reasonable accommodation may include extending a leave of absence for a reasonable period on a case-by-case basis.

Southwest Airlines also provides other reasonable workplace accommodations as required by law or otherwise approved by Southwest Airlines Leadership (e.g., accommodations for disabled veterans, pregnancy restrictions).

The **Accommodations Team** is also available to Employees and Leaders regarding gender identity or transgender workplace assistance under Southwest Airlines' guidance regarding Transgender Workers.

Requesting Workplace and Religious Accommodations

Requests for workplace or religious accommodations can be either verbal or in writing and all accommodation requests should be directed to the Southwest Airlines' Accommodations Team in the People Department. The Accommodations Team is responsible for determining whether a reasonable workplace or religious accommodation can be made. As such, an applicant or Employee in need of an accommodation, or a Leader aware of an applicant's or Employee's need or request for an accommodation, should contact the Southwest Airlines' Accommodations Team. The Team will promptly engage in the interactive process with the applicant or Employee regarding the requested accommodation.

If an Employee wants to continue working with medical restrictions, whether due to an on-the-job injury (OJI), a non-occupational illness or injury, a military service-connected disability, or a pregnancy, please contact the Accommodations Team immediately to determine possible accommodation options. If the Employee can be temporarily accommodated through Transitional, Restricted, or OJI Return to Work "light duty," but will have restrictions for longer than the maximum eight-week period, please contact the Accommodations Team as soon as possible to explore other possible workplace accommodation options.

Southwest Airlines will not tolerate any form of retaliation or discrimination against an applicant or Employee for requesting a workplace or religious accommodation. Any and all concerns about discrimination or retaliation under this Policy should be directed to his/her Leaders or to Employee Relations in the People Department at HDK, Employee.Relations-DG@wnco.com.

Accommodations Team Contact Information

The Southwest Airlines' Accommodations Team may be reached by contacting the Employee Service Center by phone at (877) 792-4792 or by email at Accommodations.Team@wnco.com.